

IN RE:

Susan Robinson fka Susan Plichta

John E. Robinson

Debtors

Toyota Motor Credit Corporation

Movant

v.

Susan Robinson fka Susan Plichta

John E. Robinson

Respondents

and

Ronda J. Winnecour, Trustee

Additional Respondent

Bankruptcy No. 15-24484-JAD

Chapter 13

Doc. No. 76

Related to Doc. Nos. 68, 71

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Toyota has filed a motion for relief from stay due to delinquent loan payments on a 2014 Toyota RAV4. (Doc. 68);

WHEREAS, Debtors have filed a response to the motion for relief from stay alleging a recent change in Debtors' financial circumstances that will allow the Debtors to bring current their plan payments and their payments to Movant. (Doc. 71);

WHEREAS, Debtors have made substantial payments to Movant during their Chapter 13 case and wish to retain the vehicle that serves as collateral for Movant's loan;

WHEREAS, John E. Robinson has returned to gainful employment;

WHEREAS, Debtors need to amend their Chapter 13 plan to increase their plan payment to provide for payment to their creditors, including Movant.

It is therefore Stipulated and agreed as follows:

1. Debtors shall file an amended Schedule I and an amended Chapter 13 Plan within 30 days.
2. Hearing on Movant's Motion for Relief from the Automatic Stay IS CONTINUED to **Wednesday, December 11, 2019**, at **10:00 AM** in **Courtroom D, 54th Floor, U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219.**

Consented to by:

/s/ Daniel R. White, Esquire

Daniel R. White, Esquire  
Zebley, Mehalov & White, P.C.  
Attorney for Debtors  
18 Mill Street Square  
P.O. Box 2123  
Uniontown, PA 15401  
Phone: 724-439-9200  
dwhite@zeblaw.com

/s/ James C. Warmbrodt, Esquire

James C. Warmbrodt, Esquire  
KML Law Group, P.C.  
Attorney for Movant  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 215-627-1322  
jwarmbrodt@kmlawgroup.com

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,



10-16-2019

Jeffery A. Deller  
United States Bankruptcy Judge

FILED  
10/16/19 3:08 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**Certificate of Notice Page 3 of 3**  
United States Bankruptcy Court  
Western District of Pennsylvania

In re:  
John E. Robinson  
Susan Robinson  
Debtors

Case No. 15-24484-JAD  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: culy  
Form ID: pdf900

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Oct 16, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 18, 2019.

db/jdb +John E. Robinson, Susan Robinson, 96 Chaffee Street, Uniontown, PA 15401-4649

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 18, 2019

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 16, 2019 at the address(es) listed below:

Daniel R. White on behalf of Joint Debtor Susan Robinson zmwchapter13@gmail.com,  
gianna@zeblaw.com;sheila@zeblaw.com;r63228@notify.bestcase.com  
Daniel R. White on behalf of Debtor John E. Robinson zmwchapter13@gmail.com,  
gianna@zeblaw.com;sheila@zeblaw.com;r63228@notify.bestcase.com  
James Warmbrodt on behalf of Creditor Toyota Motor Credit Corporation bkgroup@kmlawgroup.com  
Leon P. Haller on behalf of Creditor U.S. Bank, National Association, Trustee for  
Pennsylvania Housing Finance Agency lhaller@pkh.com,  
dmaurer@pkh.com;lrynard@pkh.com;mgutshall@pkh.com  
Leon P. Haller on behalf of Creditor Pennsylvania Housing Finance Agency lhaller@pkh.com,  
dmaurer@pkh.com;lrynard@pkh.com;mgutshall@pkh.com  
Office of the United States Trustee ustpreion03.pi.ecf@usdoj.gov  
Ronda J. Winnecour cmecf@chapter13trusteedpa.com

TOTAL: 7